April 5, 1999

William K. Hubbard
Dockets Management Branch (HFA-305)
Food and Drug Administration 9 4 3 4 \*99 APR 21 Ai0:09
5630 Fishers Lane. Rm. 1061
Rockville, MD 20852

Dear Mr. Hubbard,

The Center for Science in the Public Interest has recently drawn conclusions about Vibrio vulnificus in the shellfish industry. This petition to pasteurize post-harvest shellfish should be more readily analyzed and investigated until there is full scientific evidence that Vibrio bacteria in shellfish are infecting consumers on the west coast.

There have already been greater restrictions placed on the shellfish industry in 1998. Due to these constraints, illnesses associated with the Vibrio parahaemolyticus virus have virtually ceased on the west coast.

Instead of eliminating shellfish marketing, the FDA should spend time researching scientific data so that a substantial, comprehensive policy may be formed. As of today, no data exist that would permit the setting of a performance standard. Not enough is known about Vibrio viruses or what establishes an infectious dose.

I urge the FDA to provide funding and research necessary to develop appropriate criteria for crafting public health policy while referring this matter to the Interstate Shellfish Sanitation Conference for continuing deliberation.

Sincerely,

Ron Johansen

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